



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

400 Seventh Street, S.W.  
Washington, D.C. 20590

Paulédith Soubrier  
AIR FRANCE OA.NT  
45 rue de Paris  
95747 Roissy CDG Cedex  
FRANCE

Dear Mme. Soubrier:

This is in response to your March 21 inquiry requesting clarification on United States Variation 13(d) of the International Civil Aviation Organization Technical Instructions on the Safe Transport of Dangerous Goods by Air (US 13(d)) regarding quantity limits for dangerous goods in aircraft cargo compartments. This variation is based on 49 CFR § 175.75. You asked whether the 25 kg (55 pounds) quantity limit applies to an inaccessible aircraft hold or to each compartment within the hold.

For purposes of US 13(d) an inaccessible compartment is considered to be a space of an aircraft that is formed by walls or bulkheads with a solid flooring and ceiling and that is not accessible by crew or passengers in flight. Under US 13(d) the 25 kg limit applies to each inaccessible compartment. We note that the International Air Transport Association (IATA) defines "compartment" as "a space designated within a hold". This definition is not equivalent to the term as used in US 13(d). The IATA definition for "hold" is equivalent to the term "compartment" as used in US 13(d).

The space commonly referred to as the "aft bulk cargo compartment" on many aircraft would only be considered a separate compartment or hold for purposes of US 13(d) if it were separated from the cargo compartment immediately forward of it by a solid bulkhead. Netting is not considered a satisfactory separation device.

Please do not hesitate to contact this office if you require further assistance. For your information, guidance material clarifying US 13(d) is enclosed.

Sincerely,

Edward T. Mazzullo  
Director, Office of Hazardous  
Materials Standards

Enclosure